

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v -

ALEXANDER YAKOVLEV,

: 05 Cr.

Defendant.

05 CRIM 819

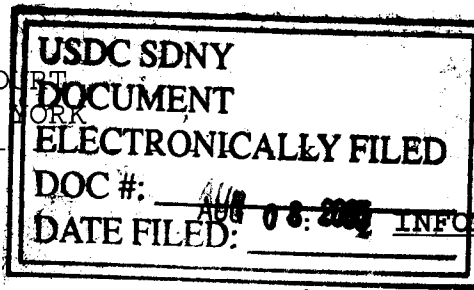
COUNT ONE

CONSPIRACY TO COMMIT WIRE FRAUD

The United States Attorney charges:

1. From at least in or about 1993, up to and including in or about June 2005, in the Southern District of New York and elsewhere, ALEXANDER YAKOVLEV, the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Sections 1343 and 1346 of Title 18, United States Code.

2. It was a part and an object of the conspiracy that ALEXANDER YAKOVLEV, the defendant, and others known and unknown, unlawfully, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, a writing,



Judge Pauley

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sign, signal, picture and sound for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Sections 1343 and 1346.

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, ALEXANDER YAKOVLEV, the defendant, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. In or about 1996, while working as a procurement officer at the United Nations, YAKOVLEV faxed from New York to a representative of a foreign company information related to that company's bid for an inspection contract under the United Nations' Oil-for-Food Program.

b. In or about 2000, while working as a procurement officer at the United Nations, YAKOVLEV established the company Moxycos, Ltd., to facilitate the illicit and secret payment of money to him by foreign companies seeking to secure contracts to provide goods and services to the United Nations.

c. In or about 2000, while working as a procurement officer at the United Nations, YAKOVLEV received a wire transfer of money from a foreign company ("foreign company 1") in return for providing that company with information from the United Nations regarding a bid for a United Nations contract related to the airlifting of United Nations supplies to foreign countries.

d. In or about 2001, while working as a procurement officer at the United Nations, YAKOVLEV received a wire transfer of money from a foreign company ("foreign company 2") in return for his assistance in helping the company obtain contracts with companies that engaged in business with the United Nations.

e. In or about 2004, YAKOVLEV received a wire transfer of money from a foreign company ("foreign company 3") in return for his assistance in helping the company obtain contracts with companies that engaged in business with the United Nations.

f. In or about 2005, while working as a procurement officer at the United Nations, YAKOVLEV received a wire transfer of money from foreign company 1 in return for providing that company with information from the United Nations regarding a bid for a United Nations contract related to the airlifting of United Nations supplies to foreign countries.

(Title 18, United States Code, Section 1349.)

COUNT TWO

WIRE FRAUD

The United States Attorney further charges:

4. From at least in or about 1993, up to and including in or about June 2005, in the Southern District of New York and elsewhere, ALEXANDER YAKOVLEV, the defendant, and others known and unknown, unlawfully, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud,

and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, a writing, sign, signal, picture and sound for the purpose of executing such scheme and artifice, to wit, YAKOVLEV agreed to receive and did receive secret monetary payments of at least several hundred thousand dollars from various foreign companies, the receipt of which benefit deprived the United Nations of the intangible right of honest services of YAKOVLEV, in relation to his performance of duties as a procurement officer at the United Nations, in violation of Title 18, United States Code, Section 1343 and 1346.

(Title 18, United States Code, Sections 1343, 1346 and 2.)

COUNT THREE

CONSPIRACY TO COMMIT MONEY LAUNDERING

The United States Attorney further charges:

5. From at least in or about 2000, up to and including in or about June 2005, in the Southern District of New York and elsewhere, ALEXANDER YAKOVLEV, the defendant, and others known and unknown, unlawfully, willfully and knowingly did combine, conspire, confederate and agree together and with each other to violate Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i) and 1957 of Title 18, United States Code.

6. It was a part and an object of the conspiracy that ALEXANDER YAKOVLEV, the defendant, and others known and unknown, in an offense involving interstate and foreign commerce, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did conduct and attempt to conduct such financial transactions, which in fact involved the proceeds of specified unlawful activity, to wit, wire fraud in violation of Title 18, United States Code, Section 1343, (a) with the intent to promote the carrying on of specified unlawful activity, and (b) knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of specified unlawful activity, in violation of Sections 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i) of Title 18, United States Code.

7. It was further a part and an object of the conspiracy that ALEXANDER YAKOVLEV, the defendant, and others known and unknown, in an offense involving interstate and foreign commerce, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did engage and attempt to engage in monetary transactions in criminally derived property of a value greater than \$10,000,

which in fact involved the proceeds of specified unlawful activity, to wit, wire fraud in violation of Title 18, United States Code, Section 1343, in violation of Section 1957 of Title 18, United States Code.

Overt Acts

8. In furtherance of the conspiracy, and to effect the illegal objects thereof, the following overt acts, among others, was committed in the Southern District of New York, and elsewhere:

a. In or about January 2001, YAKOVLEV faxed a wire transfer authorization order to the Antigua Overseas Bank Limited, instructing the bank to transfer more than \$10,000 from a bank account at Antigua Overseas Bank Limited over which YAKOVLEV had control, to a bank account in Yonkers, New York, over which YAKOVLEV had control.

b. In or about January 2005, YAKOVLEV caused a wire transfer of money to be made from a Swiss bank account over which he had control, to a bank account in New York, New York, over which he had control.

(Title 18, United States Code, Section 1956(h).)


DAVID N. KELLEY
United States Attorney

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INFORMATION

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(Title 18, United States Code,
Section 1343, 1346, 1349, 1956)

DAVID N. KELLEY
United States Attorney.
